

Fred McCallum Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
Legal Department - Suite 376
125 Perimeter Center West
Atlanta, Georgia 30346
Telephone: 770-391-2416
Facsimile: 770-391-2812

August 14, 1997

AUG 14 1997

Chairman Stan Wise
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Consideration of BellSouth Telecommunications, Inc.'s Services
Pursuant to Section 271 of the Telecommunications Act of 1996;
Docket No. 6863-U/7253-U

Dear Chairman Wise:

This purpose of this letter is to provide the Commission with further information with regard to the BellSouth letter that was discussed by Mr. Tamplin of AT&T in his summary and referred to by Mr. Adelman in his cross-examination of Mr. Scheye and Mr. Stacy in the recent hearings in these dockets. A copy of the letter sent to Mr. Tamplin is attached to this letter.

MCI clearly implied at the hearing that BellSouth is in violation of the MCI/BST interconnection agreement by virtue of sending the type of letter received by Mr. Tamplin. This is simply not correct. Paragraph 1.1.1.3 of Attachment VIII to the Agreement states that "BellSouth shall not use MCI's request for subscriber information, order submission, or any other aspect of MCI's processes or services to aid BellSouth's marketing or sales efforts." The letter at issue here is generated by the placement of a DISCONNECT order with BellSouth to terminate the customer's local residence service. MCI's request for subscriber information, order submission, or other processes or services are not utilized in this process at all. The disconnect order placed with BellSouth is not MCI's information. Rather, it is information that BellSouth, like any other local exchange carrier, will receive when a customer desires to terminate his or her service.

The form letter, which was sent only to residence customers, was originally intended to serve as a simple notification to the customer that their local service with BellSouth had been terminated. It was designed to protect the customer from being slammed.

Chairman Stan Wise

August 14, 1997

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BellSouth clearly has the right to solicit customers who have disconnected BellSouth local service, and have gone to a competitor, in order to try to win back their business. This is the essence of competition. However, this particular letter was never intended to be a win-back letter. Since language reflecting our company's desire to continue serving the customer has been construed by MCI as "win back" language and that language appears in the letter, BellSouth discontinued sending these letters effective the first week of August, 1997.

In the future, BellSouth will in all likelihood send letters to customers who have disconnected their BellSouth service seeking to win back their business back. These letters will be sent after the disconnect order has been completed and the customer has been transferred to the CLEC. No CLEC ordering or other CLEC information has been or will be used by BellSouth to generate or process these letters.

I hope this clears up any concerns about this letter.

Very truly yours,



Fred McCallum Jr.

FMJ/lmh

cc: Chairman Stan Wise
Commissioner Mac Barber
Commissioner Bob Durden
Commissioner Robert B. Baker
Commissioner David N. Baker
Nancy G. Gibson
Tiane Somer
David Burgess
Dennis Sewell
Parties of Record

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BellSouth Telecommunications
P. O. Box 100170
Columbia, SC 29202-3170

May 9, 1997
(770)351-9352

JAMES A TAMPLIN JR
445 HUNTERS CROSSING
DR NE
ATL GA 30328

Dear Customer:

We recently received your request to switch your local phone service to another carrier. Although we are disappointed to lose you as a customer, be assured that we have already handled your request and you will shortly receive your final bill as confirmation.

If you were unaware that we received a request to switch your service, please notify us of the problem so that we can correct it. Call us any day, at any time, at 1-800-733-3285.

If you have elected to leave BellSouth, we'd like you to consider coming back. Please know that we are committed to providing the most advanced technology, the highest level of service and the best value for all of your communications needs. If you would like to resume BellSouth Service, or if you would like to hear more about what we have to offer, please call 1-800-733-3285.

We value you as a customer and look forward to serving you again in the near future.

Sincerely,



Bob Daniel, General Manager-Consumer Services

PARTIES OF RECORD
Docket No. 6863-U/7253-U

Mr. Jim Hurt, Director
Mr. Kennard B. Woods
Consumers' Utility Counsel
2 Martin Luther King, Jr. Drive
Plaza Level East
Atlanta, GA 30334

Ms. Stacy Ferris-Smith
Assistant Attorney General
Department of Law
40 Capital Avenue
Suite 132
Atlanta, GA 30334

Mr. David I. Adelman, Esq.
Mr. C. Christopher Hagy, Esq.
Sutherland, Asbill & Brennan
999 Peachtree Street, NE
Atlanta, GA 30309-3996

Ms. Marsha A. Ward, Esq.
Senior Counsel
MCI Telecommunications Corp.
Southern Region
780 Johnson Ferry Road
Atlanta, GA 30342

Mr. James P. Lamoureux
AT&T Communications of the
Southern States, Inc.
Room 4048
1200 Peachtree Street, NE
Atlanta, GA 30309

Mr. William R. Atkinson
Sprint Communications Co.
3100 Cumberland Circle
Atlanta, GA 30339

Mr. John M. Stuckey, Jr.
Glass, McCullough, Sherrill & Harrold
1409 Peachtree Street, NE
Atlanta, GA 30309

Mr. Allan C. Hubbard
300 West Service Road
P. O. Box 10804
Chantilly, VA 20153-0804

Mr. Newton M. Galloway
113 Concord Street
P. O. Box 632
Zebulon, GA 30295

Mr. Charles A. Hudak
Gerry, Friend & Sapronov
Three Ravinia Drive
Suite 1450
Atlanta, GA 30346-2131

Mr. Graig J. Blakeley
Gordon & Glickson
2555 M. Street, N.W.
Suite 302
Washington, DC 20037

Mr. Richard M. Rindler, Esq.
Mr. James C. Falvey
Swidler & Berlin
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Mr. James D. Comerford
Long, Aldridge & Norman
303 Peachtree Street, Suite 6300
Atlanta, GA 30308

Mr. William Rice
Long, Aldridge & Norman
One Peachtree Center
303 Peachtree Street, NE
Suite 5300
Atlanta, GA 30308

Mr. Patrick K. Wiggins
Wiggins & Villacorta
501 East Tennessee Street
Suite 8
P. O. Drawer 1857
Tallahassee, FL 32302

Mr. Tom Allen
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619-1309

Mr. Michael S. Bradley
Hicks, Maloof & Campbell
Suite 2200, Marquis Two Tower
285 Peachtree Center Avenue, NE
Atlanta, GA 30303-1234

Mr. Charles V. Gerkin, Jr.
Chorey, Taylor & Fell
Suite 1700, The Lenox Building
3399 Peachtree Road, NE
Atlanta, GA 30326

Mr. Jonathan E. Canis
Laureen McGurk Seeger
Morris, Manning & Martin
1800 Atlanta Financial Center
3343 Peachtree Road, N.E.
Atlanta, Georgia 30326-1044

Brian Sulmonetti
WorldCom, Inc.
1616 South Federal Highway
Suite 400
Boca Raton, FL 33432

Mr. Enrico C. Soriano
Kelley, Drye & Warren
Suite 500
1200 19th Street, N.W.
Washington, DC 20036

Ms. Nancy Gibson
Assistant Attorney General
244 Washington Street
Atlanta, GA 30334

Mr. Philip J. Smith
Specially Appointed Hearing Officer
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334

Ms. Diane L. Sommer
Special Assistant Attorney General
Counsel for the Commission Advisory Staff
c/o Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334

Pamela Melton, Esq.
LCI Communications
8180 Greensboro Drive
Suite 800
McLean, VA 22102

ATTACHMENT 8A



BellSouth Telecommunications
P. O. Box 100170
Columbia, SC 29202-3170

April 25, 1997
(770)521-5445

**MARCEL HENRY
300 FAIRLEAF CT
ALPHARETTA GA 30202-4783**

Dear Customer:

We recently received your request to switch your local phone service to another carrier. Although we are disappointed to lose you as a customer, be assured that we have already handled your request and you will shortly receive your final bill as confirmation.

If you were unaware that we received a request to switch your service, please notify us of the problem so that we can correct it. Call us any day, at any time, at 1-800-733-3285.

If you have elected to leave BellSouth, we'd like you to consider coming back. Please know that we are committed to providing the most advanced technology, the highest level of service and the best value for all of your communications needs. If you would like to resume BellSouth Service, or if you would like to hear more about what we have to offer, please call 1-800-733-3285.

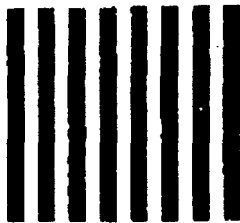
We value you as a customer and look forward to serving you again in the near future.

Sincerely,


Bob Daniel, General Manager-Consumer Services

ATTACHMENT 9

NECESSARY
IF MAILED
IN THE
UNITED STATES



11111

BUSINESS REPLY MAIL

FIRST CLASS PERMIT NO. 810 ATLANTA, GA.

POSTAGE WILL BE PAID BY ADDRESSEE:

SOUTHERN BELL
124 JONES FRANKLIN ROAD
RALEIGH NC 27690 - 0610



Customer No. _____ Employee No. _____

To help BellSouth better serve you, please take a few moments to complete this card. (POSTAGE PRE-PAID)

Service	Satisfied	Not Satisfied	No Opinion
Appointment Offered	_____	_____	_____
Appointment Kept	_____	_____	_____
Received Services/ Features Requested	_____	_____	_____
Problem Corrected	_____	_____	_____
Technician			
Attitude	_____	_____	_____
Appearance	_____	_____	_____
Efficiency	_____	_____	_____

Comments: _____

Please call 611 should you wish to speak to someone concerning your service.

Thank You

BELLSOUTH

NC Raleigh
04/95

At BellSouth, we care
about the quality of your service.

Date 9-15-97 Time 12:10 PM

Mr./Ms. Aggar

☒ Have completed your telephone installation/repair request.

☐ I was here during your absence to install your service. Access to your premises is required to complete your service request. Please call:
Residence Installation—780-2355 Business Installation—780-2800

☐ I was here during your absence to complete your installation request. I have connected the existing wires to your Network Interface in order to provide service. If you still desire the additional jacks and/or wiring you originally requested, please call:
Residence Installation—780-2355

☐ I called during your absence to repair your service. Access to your premises is required to complete your service request. Please call:
Residence / Business Repair—611

☐ Your installation request cannot be completed at this time due to a problem in our cable. We are working on the problem and will contact you within 3 working days to let you know when we can provide service. No further call is necessary; however, if you should have any questions please call:
Residence Installation—780-2355 Business Installation—780-2800

☐ I was here during your absence to repair your service. The trouble has been determined to be in your wiring or equipment. Given these circumstances we must add a trouble determination charge to your next telephone bill because you do not subscribe to the BellSouth Inside Wiring or Trouble Isolation Plan. You should arrange for repairs to be made or we will be happy to isolate the problem and repair your wiring if necessary for a one time charge which will be added to your telephone bill. If you would like BellSouth to do the repair please call:
Residence / Business Repair—611

☐ Your telephone service problem is in our outside cable. The next available facility technician will be dispatched to restore your service. No further call is needed; however, if you have any questions please call:
Repair Center—611.

☒ A temporary service wire that will be removed within 14 days (weather permitting) was placed on the ground in the (front, back, side) of your lot. If the line is not buried within this time period, please call: 780-8896.

Please call 611 should you have any comments regarding the work I did for you today.

W. Hall

Your BellSouth Representative

"We really do appreciate your business."

At BellSouth, we care

While we were working on your telephone service, our technician was unable to connect the telephone ground wire to the electrical power ground system to meet the National Electrical Code due to the items checked below:

— Power ground not placed / accessible.

— Power ground wire disconnected or broken.

Please have this condition corrected by a qualified individual to meet requirements of the National Electrical Code. BellSouth will not be responsible for any cost incurred.

A second visit by our technician will be required to provide you with your service request. When the above condition has been corrected, please call to set up a second appointment:

Mon.-Fri. 8 a.m.-5 p.m.

Residence Installation-780-2355 Business Installation-780-2800

BELLSOUTH

Dear
Telephone
Customer:

Today, your local telephone company installed a device called a Telephone Network Interface at the point where telephone company lines enter your house or building. (Figure 1)

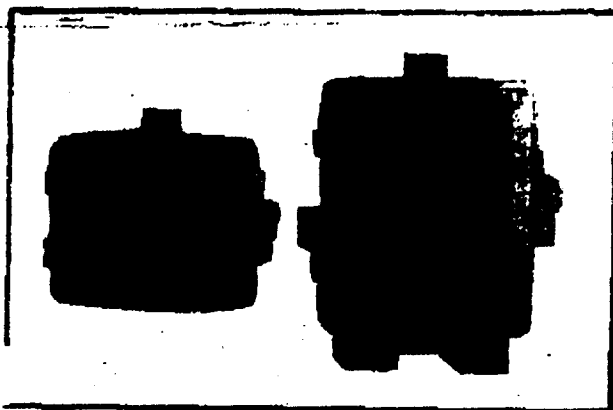


Figure 1

What Does This Device Do?

Now, when you have a problem with your telephone service, this device lets you test to determine if a problem is in your wiring or in local telephone company lines.

It also allows you or someone you authorize convenient access to fix or replace your inside wiring. Additional information is contained inside the device.

How Do You Determine Where The Problem Is?

Unplug a phone that you believe is a good working set. Locate the "Telephone Network Interface," usually on the outside of your home near your power meter.

Using a screwdriver, unscrew the cover fastener, press the snap lock on the side of the unit, and swing the cover open. Inside you'll find a modular plug and jack like the ones found in your home along with instructions on how to test. (Figure 2)

BELLSOUTH



Figure 2

Simply unplug the modular plug and wait 90 seconds before plugging in your telephone set to the jack. Now you have disconnected your inside wire and plugged your set directly into the phone company lines.

Try the phone. If the problem you experienced is still present then the cause may be in either the phone company's lines or your telephone set. If available, re-test using another phone. Otherwise, contact your telephone company and report the problem.

If the problem you experienced is not present, then the problem is either in your inside wiring, jacks or a telephone set. Contact the company or individual of your choice to do the necessary work on these items. If you are a subscriber to a Telephone Company Maintenance Plan, then contact your telephone company repair department and report the problem.

Once you have finished your test, unplug your set and securely reconnect the modular plug. Close the cover and screw the fastener down until the cover is snug and tight.

YOU MAY WANT TO SECURE
THIS DEVICE WITH A PADLOCK

BELLSOUTH



P/N 203-219 Iss. 1

March 1992

Manufactured in U.S.A. for BELLSOUTH

by Siecor — Keller, Tx.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

In the Matter of

Application of BellSouth Corporation,
BellSouth Telecommunications, Inc.
and BellSouth Long Distance, Inc.
for Provision of In-Region, InterLATA
Services in Louisiana

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)
)
)

CC Docket No. 97-231

Exhibit C:
Supplemental Declaration of Samuel King
on Behalf of MCI Telecommunications Corporation

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Application of BellSouth Corporation,)	CC Docket No. 97-231
BellSouth Telecommunications, Inc.)	
and BellSouth Long Distance, Inc.)	
for Provision of In-Region, InterLATA)	
Services in Louisiana)	

**SUPPLEMENTAL DECLARATION OF SAMUEL L. KING
ON BEHALF OF MCI TELECOMMUNICATIONS CORPORATION**

1. I am the same Sam King who submitted a declaration in response to BellSouth's Section 271 application for South Carolina. ("King Decl.").
2. Very little of BellSouth's region-wide OSS has changed since I submitted that declaration last month. In this declaration, I will discuss only the new information. I will first discuss BellSouth's changes or proposed changes to its OSS since I submitted my South Carolina declaration -- many of which probably came in response to the criticisms of BellSouth's South Carolina application. I conclude that while BellSouth has promised to fix some of the many deficiencies with its OSS in the future, it has implemented only a very small number of these fixes. Even these fixes have not yet been shown to work, and the vast majority of the problems I identified in my South Carolina declaration remain problems today. I will then discuss MCI's progress in EDI testing with BellSouth which shows that basic mapping problems remain with BellSouth's EDI interface. I will next respond briefly to the comments made by William Stacy in his reply OSS affidavit with respect to South

Carolina ("Stacy I SC Reply"). Finally, I will update the results of MCI's resale trials which continue to show that BellSouth fails to provision service at parity.

I. BELLSOUTH HAS MADE FEW MODIFICATIONS TO ITS OSS

3. BellSouth has promised to improve some of the deficient processes I discussed in my South Carolina declaration. Few, if any, of these improvements have yet been implemented, however. Moreover, with respect to many of the problems I discussed, no progress has been made. Here, I will briefly discuss those areas in which BellSouth has promised to make some improvements.
4. BellSouth still has not committed itself to an adequate process of change management; nor has it provided adequate documentation. King Decl. ¶¶ 89-92. Although MCI sent BellSouth a proposal for a change management process on September 19, 1997, BellSouth's only response to date has been a non-response -- that it will provide a response in the future. Given BellSouth's failure to commit to any particular change management process, its assertion that its process of change management is adequate (Stacy I SC Reply ¶ 63) based on a single example of BellSouth's provision of advanced notice of change to CLECs is almost comical. As I explained in my South Carolina declaration, there are numerous examples in which BellSouth provided no notice to CLECs of changes. As I will describe below in discussing MCI's continued EDI testing, BellSouth continues to provide inadequate notice of changes and its documentation continues to be, in many instances, incorrect.

5. BellSouth still has not provided MCI with the updated CGI specifications that MCI would need to attempt to develop an interim solution to integrate the pre-ordering information provided by BellSouth into its own systems. King Decl. ¶¶48-50. Although in its South Carolina filing BellSouth stated that "BellSouth has provided to interested CLECs a LENS interface specification that provides data for direct integration into a CLEC's systems" (BellSouth SC Br. at 26), BellSouth now acknowledges that it "is updating the CGI specification and will release it in the near future." William Stacy Affidavit on Operating Support Systems, App. A, Tab 12, ("Stacy I Aff.") ¶ 44. Indeed, since the time of the South Carolina filing, BellSouth has sent MCI additional CGI specifications, but these turned out to be the exact same outdated specifications that BellSouth sent in July. BellSouth attempts to justify its failure to provide these specifications by asserting that "it was not until BellSouth received MCI's letter of September 5, 1997 . . . that MCI indicated that it was ready to proceed with a joint development effort, which provides a reasonable basis for BellSouth's committing additional resources to this effort." Stacy I SC Reply ¶ 39. But, as I explained in my South Carolina declaration, MCI asked repeatedly for the specifications beginning in May. When BellSouth finally provided outdated specifications in July, BellSouth's letter indicated its intent to provide updated specifications to MCI. The letter did not state that BellSouth would only proceed to update the specifications if MCI sent yet another affirmative request for the specifications. In any case, it is now more than two months past the September 5 letter, and BellSouth still has not provided the specifications. On November 20, BellSouth told MCI that the "target date" for providing updated specifications will be December 12.

6. BellSouth still has not provided MCI with downloads of the RSAG database which, unlike downloads of the MSAG, will enable MCI to perform address validation using its own systems with confidence that the address validation will yield the correct result. King Decl. ¶¶ 55-59. After refusing to provide these downloads for many months, BellSouth has finally promised to provide MCI with estimates of the cost and time involved to provide MCI with extracts of the RSAG database needed for address validation. To date, however, BellSouth has not provided even these estimates. Moreover, BellSouth continues to refuse to provide a download of the complete RSAG database, which is what MCI desires.
7. BellSouth continues to rely on a manual process for reject notifications. King Decl. ¶¶ 95, 131-36. BellSouth states that it is developing an automated reject capability for which the initial version "will be operational in November 1997" and for which a full version will be "operational in the first quarter of 1998." (Stacy I Aff. ¶ 75). Not only does this statement implicitly acknowledge the lack of automated reject notification today, it is also deceptive. Although MCI has been asking BellSouth for specifications for reject notification for months, BellSouth did not provide any such specifications until November, well after MCI had completed its initial EDI mapping. BellSouth then unilaterally declared that CLECs should begin testing reject notification in November, ignoring the fact that CLECs generally cannot instantaneously drop other projects and re-map their systems based on an announced change from BellSouth -- and again showing the need for a clear process of change management. Nonetheless, in this case, MCI is attempting to quickly ready its systems, so that it can test automated reject notifications beginning in late November or early December. But this re-mapping is likely to prove difficult, since once again the

specifications provided by BellSouth lack examples -- a problem which, as explained in my South Carolina declaration, has caused MCI substantial development problems in the past (On November 12, BellSouth did provide a single example of one type of reject transaction -- an example MCI had expected to receive on November 3). Moreover, BellSouth acknowledged in a CLEC Forum at the end of October that even the process for automated rejects that it intends to implement early next year will not cover all reject notifications. BellSouth has yet to make clear which reject notifications will continue to be sent manually via fax.¹

8. BellSouth continues to provide loss notifications via the United States mail. King Decl. ¶¶ 95, 186-87. BellSouth states that it has "developed a report for AT&T (called OUTPLOC) which transmits information such as loss notification . . . which can also be accessed by any CLEC using EDI," Stacy I Aff. ¶53. It is unbelievable that BellSouth is willing to make such a claim. As I made clear in my South Carolina declaration, MCI has asked repeatedly to receive loss notifications via EDI and has been repeatedly turned down. King Decl. ¶ 95, 186-87, att. 21-23. Indeed, after its filing for South Carolina, BellSouth agreed that it would provide loss notifications via Network Data Mover (NDM) -- a process superior to

¹BellSouth also asserts that it does currently return some rejects electronically (Stacy I SC Reply ¶ 47), but these constitute a small percentage of all rejects. King Decl. p. 60 n. 15. BellSouth also claims that its service representatives process rejects for its own retail customers manually (Stacy I SC Reply ¶ 48). However, for CLEC orders, BellSouth representatives not only process the rejects manually, they in turn transmit them via fax or e-mail to CLECs who must in turn process the orders manually and then send a corrected order back to BellSouth (where it falls out for manual processing).

use of the United States mail but inferior to EDI.² As of today, even this interim process has yet to be implemented.

9. The specifications that BellSouth transmitted for loss notification via NDM also revealed additional deficiencies in BellSouth's process of loss notification. The specifications demonstrate that BellSouth does not intend to provide any loss notification (either via the United States mail or via NDM) in cases of a partial disconnect (e.g. a customer switches one of its two lines from MCI to BellSouth or any other CLEC); disconnect of services identified by circuit (e.g. data services); and disconnect of services identified by terminal identification (e.g. DID trunks). As a result, in these circumstances, CLECs will be entirely unaware that their customers have switched to another carrier. This will almost certainly lead to double billing of customers for a significant period of time as CLECs will continue to bill customers for services that are in fact being provided by another carrier.
10. BellSouth continues to provide service jeopardies in a manual fashion. King Decl. ¶ 95, 137-40. BellSouth has now agreed to aggregate service jeopardies and rejects (until automated rejects are available) and to send them twice a day. Although this will make it slightly easier for MCI to track and process service jeopardies and rejects, BellSouth's manual processing of rejects and service jeopardies will continue to foster delay and errors.
11. BellSouth still provides no notice to CLECs when BellSouth changes the interexchange carrier of a CLEC's local customer. King Decl. ¶ 188. Although BellSouth claims that MCI's contention to this effect "is incorrect," BellSouth's claim is belied by its later

² Later BellSouth stated that it would not be able to provide even the interim NDM process for loss notifications for 5-7 months; last week, BellSouth again reversed course and agreed to provide notification via NDM by December 15.

acknowledgment that the capability to provide such notice “will be available as of the first quarter of 1998.” (Stacy I SC Reply ¶ 69). Indeed, on November 14, BellSouth did inform MCI that by January 16, 1998, it would make available a process for informing MCI that its customers had changed PICs. This is certainly encouraging. But, as of today, BellSouth is not yet providing such notice.³

12. BellSouth continues to rely on TAFI to prove that it is providing nondiscriminatory access to maintenance and repair for telephone number based services (basic local services such as resold Plain Old Telephone Service). King Decl. ¶¶ 199-206. Although BellSouth asserts that sometime in November it will provide the industry standard T1M1 electronic bonding interface for maintenance and repair (Stacy I Aff. ¶ 97), it had not done so as of the date of its filing. MCI remains in discussions with BellSouth on the particular functionality that will be provided through the T1M1 interface, and testing has yet to begin.
13. BellSouth has not yet provided properly formatted CABS BOS bills as it was obligated to do under its contract with MCI by September 7. King Decl. ¶¶ 209-12. Although BellSouth claims to have sent MCI five CABS BOS tapes, BellSouth correctly acknowledges that only on October 23 did BellSouth correct the basic problem with its CABS BOS tapes that MCI identified in September. Hollett Aff. ¶ 9. Once this header problem was corrected, MCI was able to review the data on the rest of the tape. MCI identified three editing problems any of which would cause the bills to error out in MCI’s systems. MCI detailed the

³BellSouth’s contention that it sends PIC change confirmation to the carrier (Stacy I SC Reply ¶ 69) must be referring to the IXC who loses or gains the customer, not notification to the CLEC whose customer is changing IXCs.

problems to BellSouth in early November, and BellSouth promised to send MCI a new test tape when the problems had been corrected. To date, BellSouth has not done so.⁴

14. BellSouth asserts that it has fixed two processes since its South Carolina filing. BellSouth contends that orders for those few unbundled elements that can be placed via EDI will now flow through BellSouth's systems automatically. (Stacy I Aff. ¶ 59). While this ostensible improvement is certainly a desirable one, BellSouth presents no test data or data of any other sort to show that UNE orders will now flow through. Similarly, BellSouth's assertion that CLECs can now use "the Quickservice or the Connect-Through indicators" in LENS "to determine if a technician needs to be dispatched" has yet to be demonstrated. (Stacy I Aff. ¶ 48). Although the Quickservice and Connect-Through indicators do now appear on the LENS screens, BellSouth has not provided instruction to CLECs as to use of these indicators. For example, BellSouth has not informed CLECs as to whether an indicator from LENS that a technician does not have to be dispatched means that CLECs can request and obtain a due date of same day or next day for an order of new telephone service. Indeed, only after repeated inquiries did MCI even learn from BellSouth that the absence of a Quickservice indicator on the address validation screen is supposed to indicate that a technician will have to be dispatched to process the order.
15. Hence, BellSouth has implemented few fixes since I wrote my South Carolina declaration and those it has implemented have not yet been proven to work. In fact, in addition to the deficiencies I discussed in my South Carolina declaration, I want to briefly mention a few

⁴BellSouth's assertion that CABS BOS is a guideline rather than a standard is a word game. Hollett Aff. ¶ 8. CABS BOS is the only solution recommended by the industry for billing of resale and basic unbundled elements.

other deficiencies which either have become apparent since I wrote that declaration or which I neglected to mention in that declaration. First, MCI receives downloads of the PSIMs database showing feature availability by central office. King Decl. ¶ 79. It has become apparent that the database is missing important information and also contains errors. For example, PSIMS is missing correct voice mail feature information such as the voice mail platform and the call forwarding information -- information needed in order to issue an order for voice mail. The fundamental inaccuracies in the PSIMS database -- which BellSouth has told MCI will take several weeks to correct -- suggest that PSIMS is not the database for feature availability that BellSouth uses itself. If BellSouth were using this database regularly, it would have corrected such basic errors. BellSouth's decision that CLECs will use different databases than BellSouth uses and BellSouth's failure to explain what differences exist between the two sets of databases prevent CLECs from knowing all of the discriminatory aspects of BellSouth's OSS.

16. Second, MCI has learned that all supplemental orders (e.g. orders that change a pending order) will fall out of BellSouth's systems for manual processing, thus adding another source of delay and error to the ordering process. Third, MCI has learned that not only are rejects processed and transmitted manually by BellSouth, but when CLECs transmit a corrected order to BellSouth that order will fall out for manual processing -- again adding another source of delay and error. Fourth, I neglected to mention in my South Carolina declaration BellSouth's failure to properly train its employees to answer CLEC billing questions. BellSouth divides responsibility for billing questions between the LCSC and the ICSC (Interexchange Carrier Service Center). The ICSC is the group that has worked with

IXCs for years. Unfortunately, however, the ICSC has received insufficient training on local issues. ICSC representatives have little if any familiarity with MCI's interconnection agreement and generally take an extremely long time to find out the answers to MCI questions. Finally, as I have already explained, MCI has learned that BellSouth's manual process of loss notification does not even cover all losses. Thus, not only do almost all of the problems described in my South Carolina declaration continue to exist, new problems have become apparent.

II. WILLIAM STACY'S SOUTH CAROLINA REPLY AFFIDAVIT FAILS TO SHOW THAT BELL SOUTH'S OSS IS NONDISCRIMINATORY

17. In William Stacy's OSS reply affidavit regarding South Carolina, he addressed a few of the problems I raised with respect to BellSouth's OSS. Not only do his explanations fail to cover many of the problems I discussed, his explanations are inadequate even with respect to the areas he does discuss.
18. Mr. Stacy attempts to justify BellSouth's failure to provide a system to system pre-ordering interface by asserting that "there has been no demand [for such an interface] outside the hearing room." Reply Affidavit of William N. Stacy on Performance Measures ("Stacy 2 SC Reply") ¶ 31. As I explained in my South Carolina declaration, however, MCI repeatedly has asked BellSouth to discuss development of an EDI TCP/IP pre-ordering interface and BellSouth has refused to do so. King Decl. ¶ 42.
19. Mr. Stacy responds to several criticisms of LENS by arguing that they are irrelevant, because they only apply to functions used for orders for new installation of service. (Stacy I SC Reply. ¶¶ 18, 24, 28). Stacy implies that because most CLEC orders will be change

orders, the discriminatory access that exists with respect to pre-ordering functions used for new installations is somehow rendered irrelevant. But not only is BellSouth obligated to provide nondiscriminatory access to pre-ordering for all types of orders, but BellSouth's own data shows that new installations constitute a substantial volume of BellSouth's orders even at these earliest stages of competition. William Stacy Affidavit on Performance Measures, App. A, Tab 13 (Stacy 2 Aff., Ex. WNS-12).⁵ In addition, CLECs do need access to DSAP for due date inquiries even for change orders. If a CLEC had access to DSAP to obtain a due date, this would enable it to "reserve" that due date so that the CLEC could be at least somewhat comfortable telling a customer the expected installation interval; in contrast, use of BellSouth's listed installation intervals -- such as its promise that a change order placed by 3:00 will be processed that day (Stacy 2 SC Reply ¶ 28) -- provides no such comfort. MCI's own data shows that when MCI places orders through LENS (and thus uses the firm order mode of LENS to obtain a due date from DSAP) BellSouth meets the date obtained far more often than it meets the dates requested by MCI -- requests which are based on the promised installation intervals.

20. Mr. Stacy responds to two criticisms of BellSouth's pre-ordering interface -- the need for multiple address validation (King Decl. ¶51)⁶ and the inability to receive a calculated due

⁵ BellSouth is, of course, correct that most CLEC orders at the early stages of competition are likely to be change orders, but all this does is emphasize that BellSouth's performance data, which BellSouth claims show parity, actually show better performance for BellSouth retail customers than for CLECs. This is because for most categories involving change orders -- where most CLEC orders have been concentrated to date -- BellSouth performs better for its retail customers than for CLECs.

⁶Contrary to BellSouth's contentions, when the CLEC customer service representative validates an address, it often takes more than "a few seconds." (Stacy I SC Reply ¶ 26). Especially

date (King Decl. ¶¶70-75) -- by arguing that these difficulties can be avoided by CLECs that use the firm order mode of LENS. (Stacy I SC Reply ¶¶ 23, 25). However, he does not even attempt to justify why CLECs should have to use the extremely burdensome firm order mode of LENS to obtain pre-ordering information. As I explained in my South Carolina declaration, the firm order mode of LENS requires CLECs to access each pre-order function in a predetermined sequence (with due date calculation last in the sequence) and to enter ordering information as if the CLEC were going to use LENS to place an order (even though the CLEC will then have to enter this same information through EDI). King Decl. p.23 n.7, p. 32 n.11. In addition, although Mr. Stacy contends that CLECs can reserve a phone number in LENS even if they intend to place orders through EDI (Stacy I SC Reply ¶ 23), LENS itself flashes a message suggesting that a phone number or due date reserved in the firm order mode of LENS will be canceled if the CLEC does not actually place the order through LENS.⁷ The message states, "Do you really want to cancel? Note: all current work will be discarded."

when combined with the other delays caused by use of LENS -- the lack of an automatically populated telephone number to offer to the customer without use of the number reservation function; the need to scroll through multiple screens to obtain feature and PIC information, and the increased possibility of being kicked out of the system -- the delays caused by use of LENS are substantial. With respect to the need to scroll through multiple screens, BellSouth attempts to divert the Commission by indicating that this process is also required for a BellSouth customer service representative using DOE (Stacy I SC Reply ¶41). -- ignoring the fact that BellSouth must provide parity for residential orders as well as business orders and a BellSouth representative using BellSouth's residential system RNS would not have to scroll through multiple screens.

⁷Mr. Stacy's contention that telephone numbers can be reserved in the firm order mode reemphasizes the need for BellSouth to provide accurate information in documents and on the screen concerning the capabilities of its systems. This is also emphasized by Mr. Stacy's claim that CLECs can select six numbers at a time twice in a single LENS session (Stacy I SC Reply ¶24), something BellSouth has not claimed previously either in discussions with MCI or in testimony.

21. With respect to BellSouth's failure to provide a customer's tax exempt information as part of pre-ordering information even though this information is available to BellSouth (King Decl. ¶82), Mr. Stacy first obfuscates the issue by discussing a CLEC's tax exempt status rather than the customer's status. (Stacy I SC Reply ¶ 42). He then attempts to justify BellSouth's failure to provide this information simply by asserting, without explanation, that this information is not part of pre-ordering information. (Stacy I SC Reply ¶ 42). Similarly, Mr. Stacy's attempt to justify BellSouth's failure to provide three pre-ordering functions being addressed by the OBF (King Decl. ¶84) -- by asserting that they are being addressed "more as ordering functions" -- is a non-explanation. (Stacy I SC Reply ¶ 43). His claim that MCI can request this functionality through a BFR (Stacy I SC Reply ¶ 43) only emphasizes BellSouth's continued misuse of the BFR process.
22. Mr. Stacy's other efforts to explain away the deficiencies with BellSouth's OSS require little comment. Mr. Stacy fails to address many deficiencies at all, and, with respect to others, he does little more than reiterate the position he set forth in his original affidavit.

III. MCI'S TESTING CONTINUES TO SHOW THAT BELL SOUTH'S EDI INTERFACE DOES NOT YET WORK

23. As I discussed in my South Carolina declaration, MCI's testing with BellSouth has revealed that as of today, BellSouth's EDI interface simply does not work. King Decl. ¶¶ 106-14. In particular, MCI's early testing revealed four extremely basic problems with BellSouth's interface that would cause almost all orders to be rejected. MCI has worked with BellSouth to develop solutions to these problems but these problems have not yet all been corrected. Moreover, some additional problems have been revealed.